

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BEARBOX LLC and AUSTIN STORMS,

Plaintiffs,

V.

LANCIUM LLC, MICHAEL T. MCNAMARA,
and RAYMOND E. CLINE, JR.

Defendants.

REDACTED PUBLIC VERSION

C.A. No. 21-534-MN-CJB

**PLAINTIFFS' SEPARATE CONCISE STATEMENT OF
MATERIAL FACTS FOR TRIAL REGARDING DAMAGES**

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*Attorneys for Plaintiffs
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Dated: July 22, 2022

Pursuant to the Court’s Scheduling Order (D.I. 35), Plaintiffs BearBox LLC (“BearBox”) and Austin Storms (“Storms”) (collectively, “Plaintiffs”) submit the following concise statement of material facts for trial regarding damages in support of their opposition to Defendants’ motion for summary judgment regarding damages.

1. Lancium has extensively relied upon the converted property obtained from Austin Storms for its CLR (controllable load resource) operations, and Lancium extensively relied upon the converted property for seeking and obtaining investments, company valuations, and company expansions. Lancium will continue to use the converted property as part of the operation of its clean campuses. The following sources of evidence (among other evidence) support these disputed factual conclusions:¹

- Ex. FF (LANCIUM00035934) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- D.I. 151, Ex. 3 (McClellan Opening Report) ¶ 308

¹ All Exhibits are attached to the Declaration of Chelsea Murray filed herewith, unless otherwise noted.

- Ex. GG (LANCIUM00021608) [REDACTED]
[REDACTED]
[REDACTED]
- Ex. HH (LANCIUM00031208) [REDACTED]
[REDACTED]
[REDACTED]
- Ex. II (LANCIUM00031205) [REDACTED]
[REDACTED]
- Ex. JJ (RIOT000044) [REDACTED]
[REDACTED]
- Ex. KK (LANCIUM00036028)
- Ex. LL (LANCIUM00035926)
- Ex. MM (McCamant Dep.) at 153-154
- Ex. NN (McNamara Dep.) at 98-99.

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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of July, 2022, the attached **PLAINTIFFS'**
SEPARATE CONCISE STATEMENT OF MATERIAL FACTS FOR TRIAL REGARDING
DAMAGES was served upon the below-named counsel of record at the address and in the manner
indicated:

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